

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

RONDA A. METTEY,

Plaintiff,

v.

AMERICAN FAMILY MUTUAL  
INSURANCE COMPANY, et al.,

Defendants.

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Case No. 1:02-CV-00398

Judge Spiegel

Magistrate Judge Black

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JAMES DONNIN  
CLERK  
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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**AGREED UPON PROTECTIVE ORDER**

Plaintiff has served discovery requests asking for confidential and proprietary information and documents from Defendant. Defendant desires to protect from authorized use and disclosure the information, discovery, and documents requested by Plaintiff. Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, by agreement of the parties and for good cause shown,

**IT IS HEREBY ORDERED THAT:**

1. The names, addresses, and any other personal information about current, past or potential policyholders of American Family Mutual Insurance Company furnished to Plaintiff's attorneys or to Plaintiff by Defendant pursuant to Plaintiff's formal or informal requests therefor, through discovery procedures or otherwise, shall not be displayed or revealed, nor shall their contents be directly or indirectly disclosed to any persons excepting Plaintiff or Plaintiff's attorneys, partners and employees of Plaintiff's attorneys or experts, consulted or obtained by Plaintiff who are to be advised of the confidential nature of this information and bound by the terms of this Order.

2. Any information contained in the "computer tape" and/or the "back-up tape" kept by Plaintiff which has been the subject of a Motion to Compel filed by Plaintiff, the contents of which have been produced by Defendant in its Response to Plaintiff's Second Request for Production of Documents No. 4, shall not be used for any purpose or in any matter except in connection with the trial or in preparation for the trial of this civil action.

3. Documents, records, data, material, the names, addresses, and any other personal information about current, past or potential policyholders of American Family Mutual Insurance Company gathered from the documents furnished to Plaintiff or Plaintiff's attorney by Defendant under the conditions set forth in Paragraph 1 above shall not be used for any purpose or in any matter except in connection with the trial or in preparation for the trial of this civil action.

4. Within thirty (30) days of the conclusion of the above-captioned proceeding, all the documents and information subject to this protective order, including all copies, extracts or summaries thereof, and/or documents containing information taken therefrom, shall be returned to counsel for Defendant by Plaintiff and her attorney.

5. The provisions of this Protective Order may only be modified by subsequent written agreement of the parties or by order of this Court.

Date: 10/21/04

Timothy S. Black  
Magistrate Judge Timothy Black

APPROVED BY:

/s/ John A. Rebel  
John A. Rebel – 0031771  
Attorney for Plaintiff

/s/ Douglas M. Kennedy  
Douglas M. Kennedy – 0022053  
Attorney for Defendants  
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